

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Index No. 1:17-cv-08980-VEC

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BHUTAN INTERNATIONAL FESTIVAL, LIMITED;  
BHUTAN DRAGON EVENTS AND FESTIVALS,  
LIMITED,

Plaintiff(s),

-against-

EDEN PROJECT; EDEN PROJECT LIMITED; EDEN  
LAB; AND EDENLAB LTD.,

Defendant(s).

**AFFIRMATION IN  
SUPPORT OF REQUEST  
FOR CERTIFICATE OF  
DEFAULT**

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Edward G. Bailey hereby declares as follows:


1. I represent the plaintiffs in this action.
2. This action was commenced pursuant to the filing of a Summons and Complaint on November 29, 2017.
3. The time for defendant(s), Eden Lab and EdenLab Limited to answer or otherwise move with respect to the complaint herein has expired.
4. Defendant(s), Eden Lab and EdenLab Limited have not answered or otherwise moved with respect to the complaint, and the time for defendants Eden Lab and EdenLab Limited to answer or otherwise move has not been extended.
5. That defendants Eden Lab and EdenLab Limited are not infants or incompetents. Defendants Eden Lab and EdenLab Limited are not presently in the military service of the United States as appears from facts in this litigation.

WHEREFORE, plaintiffs Bhutan International Festival, Limited and Bhutan Dragon Events and Festivals, Limited requests that the default of defendants Eden Lab and EdenLab Limited be noted and a certificate of default issued.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the amount claimed is justly due to plaintiff, and that no part thereof has been paid.

Dated: Syosset, New York  
May 29, 2018

**BAILEY LAW, P.C.**  
*Attorneys for Plaintiffs*

By:   
Edward G. Bailey (EB-9954)  
485 Underhill Boulevard, Suite 308  
Syosset, NY 11791  
(516) 864-2100